

### REMARKS

Claims 1-14 are pending. By this Amendment, claims 1 and 5 have been amended.

Entry of the Amendments and Remarks is respectfully requested because entry of the Amendments and Remarks place the present application in condition for allowance, or in the alternative, better form for appeal. No new matters or additional claims have been added.

In view of the above Amendments and the following Remarks, Applicants respectfully request reconsideration and timely withdrawal of the pending rejections for the reasons discussed below.

#### ***Rejections Under 35 U.S.C. §103***

Claims 1, 3, 5, 7 and 9-14 are rejected under 35 U.S.C. §103(a) as being unpatentable over JP Patent 8129375 (hereinafter “JP ‘375”) in view of U. S. Patent Application Publication No. US 2002/0126161 invented by Kuzunuki, *et al.* (hereinafter “Kuzunuki”). This rejection is respectfully traversed.

Applicants’ claims 1 and 5 disclose a real size display system, comprising a flat panel display unit including a plurality of dots for displaying image information and providing information on a size of the dots ... wherein the first image information includes measurement information, and wherein the first image information is converted into the second image information based on the dot size information received from the flat panel display unit.

Applicants respectfully submit that JP ‘375 or Kuzunuki both fail to disclose the combination of features recited in claims 1 and 5 including these features of Applicants’ claims 1 and 5. First, Applicants submit that nowhere does JP ‘375 disclose **a flat panel display unit which includes a plurality of dots and provides information on a size of the dots** and that a



**first image information is converted into a second image information based on the dot size information received from the flat panel display.** Further, Applicants submit that nowhere does JP '375 disclose that the first image information includes **measurement information**. Instead, Applicants submit that JP '375 simply discloses the display of a video in a screen size as shown in a reference for a video source, without depending on the screen size of the display being used to display the video (Abstract). More particularly, JP '375 discloses image conversion based on **screen size** information. As stated in paragraph 5 of JP '375, the purpose of the invention disclosed in JP '375 is to provide an image size compensator which performs enlargement or reduction of the source of an image so that the size of a photographic subject may be kept constant. Applicants respectfully submit that **dot size** and **screen size** are very different characteristics as the screen size is based on both the size of the dots forming the screen and the resolution of the display. Thus, although two display devices may have the same screen size, they may have difference dot sizes if they have different resolutions.

Second, page 4 of the Office Action states that the step of the first image information including measurement information is obvious because the first image can be provided by picture device or camera. However, Applicants respectfully submit that in JP '375 the real size of a subject being displayed is irrelevant, as JP '375 focuses on maintaining the size of the image of a subject in a reference video constant irrespective of the size of the display used to show the video and nowhere does JP '375 disclose or suggest measurement of a variable to maintain the constant size.

Third, Applicants respectfully submit that Kusunuki fails to overcome the deficiencies of JP '375, as discussed above with regards to claims 1 and 5 because Kusunuki also fails to disclose a flat panel display unit including a plurality of dots for displaying image information

and providing information on a size of the dots ... wherein the first image information includes measurement information, and wherein the first image information is converted into the second image information based on the dot size information received from the flat panel display unit, as recited in Applicants' claims 1 and 5. Kuzunuki is directed to an information processing system which includes a desk with a planar display unit which accommodates physical objects to be manipulated by an operator. More particularly, in Kuzunuki, a camera is used to monitor the desk display surface and is coupled to an electronic computer which can be controlled by the operator by moving the physical objects and the operator's hands to simulate paper processing tasks, such as mailing, faxing, filing, opening files and editing (Abstract). Further, Applicants submit that there is no motivation to combine the teachings of Kuzunuki with the teachings of JP '375, which is directed to a video size corrector to disclose a real size display system with the features recited in Applicants' claims 1 and 5.

For at least these reasons, Applicants submit that JP '375 and Kuzunuki, alone or in combination, fail to disclose or suggest all the features of Applicants' claims 1 and 5, as well as all the features of claims 3, 7 and 9-14, which each depend from claims 1 or 5. Thus, JP '375 and Kuzunuki, alone or in combination, fail to render obvious all the features of claims 1, 3, 5, 7 and 9-14. It is respectfully requested that the rejection be withdrawn.

Claims 2, 4, 6 and 8 are rejected under 35 U.S.C. §103(a) over JP '375 in view of U.S. Patent No. 5,630,105 issued to Itagaki. The rejection is respectfully traversed.

For the reasons discussed above, with regards to claims 1 and 5, Applicants submit that JP'375 fails to disclose or suggest all the features of claims 1 and 5, from which claims 2 and 4, and 6 and 8, respectively depend from. Further, Applicants submit that Itagaki fails to overcome the deficiencies of JP '375 because Itagaki also fails, at least, to disclose a real size display

system, comprising a flat panel display unit including a plurality of dots for displaying image information and providing information on a size of the dots ... wherein the first image information includes measurement information, and wherein the first image information is converted into the second image information based on the dot size information received from the flat panel display unit, as recited in claims 1 and 5.


For at least these reasons, Applicants submit that JP '375 and Itagaki, alone or in combination, fail to disclose or suggest all the features of claims 2, 4, 6 and 8. Thus, the combination of JP '375 and Itagaki fails to render obvious all the features recited in claims 2, 4, 6 and 8. It is respectfully requested that the rejection be withdrawn.

**CONCLUSION**

All of the stated grounds of objection and rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding objections and rejections and that they be withdrawn. Applicants believe that a full and complete response has been made to the outstanding Office Action and, as such, all pending claims are in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment is respectfully requested.

Respectfully submitted,

  
Hae-Chan Park  
Reg. No. 50,114

Date: January 8, 2004

**McGuireWoods LLP**  
1750 Tysons Boulevard  
Suite 1800  
McLean, VA 22102-4215  
Tel: 703-712-5365  
Fax: 703-712-5280  
HCP:MMI/bjb

\\COM380743.1